

**Hannah Flynn**

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**From:** McCartan, Fiona <Fiona.McCartan@infrastructure-ni.gov.uk> on behalf of Beggs, Alistair <Alistair.Beggs@infrastructure-ni.gov.uk>  
**Sent:** 03 February 2022 17:14  
**To:** Maura Fox  
**Cc:** Proinsias McCaughey; Local Development Plan  
**Subject:** DFI comments to DCSDC Proposed Changes Consultation - 03.02.22  
**Attachments:** DCSDC DPS Proposed Changes Consultation Response Cover Letter.pdf; Dfi comments to DCSDC Proposed Changes Consultation FEB 2022.pdf; TPMU - DCSDC Schedule of Proposed Changes to DPS.pdf; Rivers - DCSDC Schedule of Proposed Changes to DPS.pdf; Roads - DCSDC Schedule of Proposed Changes to DPS.pdf; WDPD - DCSDC Schedule of Proposed Changes to DPS.pdf

Good afternoon Maura

Please see attached letter and Encls from Alistair Beggs, Director of Strategic Planning Directorate, Dfi for your attention.

Kind regards.

Fiona



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**DERRY CITY AND STRABANE DISTRICT COUNCIL**  
**LOCAL DEVELOPMENT PLAN 2032 DRAFT PLAN STRATEGY**  
**SCHEDULE OF PROPOSED CHANGES**

**Comments provided by Department for Infrastructure, Rivers.**

**January 2022**

The Department for Infrastructure, Rivers has reviewed the contents of the Derry City and Strabane District Council Draft Plan Strategy, Schedule of Proposed Changes and comment as follows.

Department for Infrastructure, Rivers, considers a number of issues detailed below which the Council will wish to consider with their Proposed Changes to Draft Plan Strategy.

## **Chapter 21 Natural Environment**

### **Policy NE4 Development adjacent to Main Rivers and Open Water Bodies.**

Proposed Change PC182. To provide amended text to make NE 4 more robust

DfI Rivers have no further comment in relation to this proposed change.

## **Chapter 22 Coastal Development**

### **Policy CD 1 Coastal Development**

Proposed change PC188. To provide a relevant cross reference to policy FLD 1 within policy CD 1 text.

DfI Rivers comment – Agreed, DfI Rivers considers it would be useful within this policy to provide reference to Flood Maps NI, which shows extents of coastal flooding.

## **Chapter 24 Renewable and Low Energy Development**

### **Policy RED 1 Renewable and Low Energy Development – General Criteria**

Proposed Change 220. J&A to acknowledge the impacts of renewables on water flows and quantities from abstraction as this is not set out elsewhere in the dPS.

DfI Rivers acknowledges the amendments to the text within J&A

DfI Rivers considers that this could have been clarified further by including -

“In relation to hydroelectric power generation schemes, applicants should be aware of siting within catchments with a flow gauging station as this can completely alter the flow regime of a river. DfI Rivers will advise against siting in such areas, as this would result in the loss of decades of national river flow archive data used to estimate flood risk across the UK”.

## **Chapter 25 Development and Flooding**

### **Policy FLD1 Development in Fluvial (River) and Coastal Flood Plains**

Proposed Change 227. Additional text to take into account climate change.

DfI Rivers welcomes the proposed change to text to include reference to Climate Change Allowance.

Also similar changes to paragraphs 25.16 and 25.17 regarding the definition of a floodplain for the sake of consistency.

Proposed Change 229. Amend flood defence top level to accord with current advice.

DfI Rivers welcomes the proposed change to text *“this is normally 600mm above the design flood level”* and would consider additional wording *“which has included Climate Change Allowance”* after design flood level for clarity and remain consistent with Proposed Change 227

## **Policy FLD 5 Development in Proximity to Controlled Reservoirs**

Proposed Change 232. Add text to policy to include erroneous omissions from PPS 15 Policy FLD 5.

Dfi Rivers welcomes the proposed change to include new text for second bullet point and would consider additional wording “or other analysis” after Flood Risk Assessment to be consistent with previous advice.

Proposed Change 233. Amend text to consider ‘consequence’ not ‘probability’ of reservoir failure in line with current guidance.

Dfi Rivers welcomes the proposal to amend paragraph 25.80 to change all references of ‘risk’ to ‘consequence’.

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Department for Infrastructure, Rivers.

Planning Advisory and Modelling Unit

28 January 2022

